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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF THE INVESTIGATION
OF THE COST OF TELECOMMUNICATIONS
ACCESS

DOCKET NO. T-00000D-00-0672

COMMENTS OF VERIZON CALIFORNIA INCORPORATED

Verizon California Incorporated ("Verizon-CA") hereby submits its Comments in response to the Procedural Order of the Arizona Corporation Commission ("Commission") dated December 3, 2001, as amended ("Procedural Order"), in the above-captioned matter.

I. INTRODUCTION

Verizon-CA provides local exchange telephone service in portions of La Paz County, Arizona. Verizon-CA is the successor of GTE California Incorporated and Contel of California, Inc., and it or these predecessor companies have been serving Arizona consumers in this rural part of the state since the 1960's.¹ Verizon-CA's Arizona service area consists of six small exchanges covering some 3000 square miles of largely remote desert regions. Most of its 8500 Arizona access lines are located in and about the City of Parker, Arizona, although Verizon-CA also serves the Arizona communities of Victorville, Ehrenberg, and Cibola.

...

¹ Contel of California was itself a combination of several smaller telephone companies whose service to Arizona predates World War II.

II. COMMENTS ON QUESTIONS IN PROCEDURAL ORDER

Verizon-CA is not an official intervener in this docket at the present time. It will therefore limit its Comments to Question 9 and to the extent such Comments are also relevant, to Questions 17 and 25.

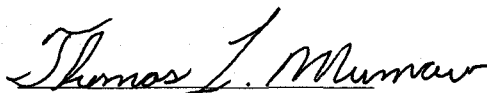
Access charges from Qwest Communications, Inc., and to a lesser extent, Citizens Communications Corporation comprise virtually all of the intrastate access charges paid by inter-exchange carriers in Arizona. Any re-examination of access charges should begin with those companies. Once the Commission determines an appropriate access charge regime for the two largest Arizona local exchange carriers, it should then undertake a separate proceeding to ascertain whether such regime makes practical sense for small rural carriers such as Verizon-CA. In making that determination, the Commission should be mindful of the impact of access charges on the goal of universal service in the rural areas served by Verizon-CA.

III. CONCLUSION

Verizon-CA again thanks the Commission for this opportunity to comment on the Procedural Order. Although serving only a few thousand Arizona access lines, Verizon-CA is proud of its long record of service in this state. Once the Commission has completed its examination of intrastate access charges for the two largest local exchange carriers, Verizon-CA looks forward to participating in any subsequent proceeding on small rural carrier access charges.

RESPECTFULLY SUBMITTED this 8th day of March 2002.

SNELL & WILMER, L.L.P.


Thomas L. Mumaw

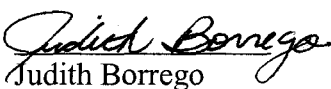
Attorneys for Verizon California Incorporated

1 Original and 10 copies of the foregoing
2 filed this 8th day of March, 2002, with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington
6 Phoenix, AZ 85007

7 Copy of the foregoing was mailed this
8 8th day of March, 2002, to:

9 All Parties of Record

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